

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

United States of America,

Plaintiff,

v.

Eight Thousand Three Hundred Thirty-Two
Dollars and Seventy-Five Cents (\$8,332.75) in
U.S. Currency, more or less,

One Bulova watch, classic blue dial with
two-tone bracelet:

One Movado watch, stainless steel with
single cut diamonds in the face;

One sterling silver and diamond bracelet with
19 round diamonds;

One 14K white gold diamond wrap with
38 diamonds;

One 14K white gold diamond ring, princess cut
diamond with 16 diamonds;

One United States \$5 bill year 1963 red seal;

Three United States \$100 starred bills years:
2009, 2009, 2006;

Two United States \$10 bills year 1934;

One United States \$1 bill year 2013;

Thirty-three United States \$2 bills: (23-1976),
(5-2003), (5-2009);

Two United States \$20 bills year 2009 & 2013 star notes;

One United States \$1 bill year 1957;

One United States \$20 bill year 1990;

Civil No.

JURY TRIAL REQUESTED

One United States \$10 bill year 1985;)
)
One United States \$5 bill year 1953 red seal;)
)
One United States \$1 bill year 1935;)
)
Two United States \$20 bills year 1974 & 1971, and)
)
One United States \$5 bill year 1995,)
)
all seized from 6 Brodeur St., Apt. 3, Concord, N.H.,)
)
Defendants <i>in rem</i> .)

**VERIFIED COMPLAINT FOR FORFEITURE *IN REM*,
FOR PROPERTY WITHIN THE UNITED STATES' POSSESSION, CUSTODY
OR CONTROL PURSUANT TO SUPPLEMENTAL RULE G(2)**

Plaintiff, United States of America, brings this Complaint according to Supplemental Rule G(2) of the Supplemental Rules for Certain Admiralty and Maritime Claims and Asset Forfeiture Actions, and alleges:

NATURE OF THE ACTION

This is an action to forfeit and condemn to the use and benefit of the United States of America the captioned defendants *in rem* pursuant to 21 U.S.C. § 881(a)(6).

JURISDICTION AND VENUE

The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1345 and 1355(a). Venue is proper in this district pursuant to 28 U.S.C. §§ 1395 and 1355(b)(1).

THE DEFENDANTS *IN REM*

The defendants *in rem* are (1) Eight Thousand Three Hundred Thirty Two Dollars And Seventy-Five Cents (\$8,332.75) in U.S. Currency, more or less; (2) One Bulova watch, classic blue dial with two-tone bracelet; (3) One Movado watch, stainless steel with single cut diamonds in the face; (4) One sterling silver and diamond bracelet with 19 round diamonds; (5) One 14K

white gold diamond wrap with 38 diamonds; (6) One 14K white gold diamond ring, princess cut diamond with 16 diamonds; (7) One United States \$5 bill year 1963 red seal; (8) Three United States \$100 starred bills years: 2009, 2009, 2006; (9) Two United States \$10 bills year 1934; (10) One United States \$1 bill year 2013; (11) Thirty-three United States \$2 bills: (23-1976) (5-2003), (5-2009); (12) Two United States \$20 bills years 2009&2013 star notes; (13) One United States \$1 bill year 1957; (14) One United States \$20 bill year 1990; (15) One United States \$10 bill year 1985; (16) One United States \$5 bill year 1953 red seal; (17) One United States \$1 bill year 1935; (18) Two United States \$20 bills year 1974&1971, and (19) One United States \$5 bill year 1995, all of which are currently in the custody of the United State Postal Inspection Service (USPIS).

FACTS

1. Beginning in March 2019, Postal Inspectors identified Jason Manley (“Manley”) of 6 Brodeur St. #3, Concord, New Hampshire, as a customer for a dark web narcotics vendor.

2. On July 9, 2020, federal agents intercepted and inspected a parcel pursuant to a federal search warrant. The parcel contained approximately 1.98 lbs. of a white/clear crystalline substance that subsequently tested positive for methamphetamine. Inspectors repackaged it for a controlled delivery.

3. On July 10, 2020, an undercover inspector made the controlled delivery of the package to Manley, who confirmed his identity and said that he was expecting a package. Shortly after the controlled delivery, inspectors, agents, and state troopers executed a federal search warrant at 6 Brodeur St., Apt. 3, Concord, New Hampshire. Manley and his girlfriend, Kelly Barton (“Barton”), were inside the apartment. Barton falsely identified herself as “Alyssa Connor” to stymie law enforcement officers from discovering her criminal history. Barton is the

subject of outstanding state warrants for felony drug charges and failure to appear.

4. Outside the apartment, inspectors advised Manley of his *Miranda* rights. Manley stated that he understood his rights and agreed to answer questions. He said that he ordered narcotics via the dark web and knew that the parcel he had just received contained methamphetamine. Manley said that he paid \$14,000 for the 2 lbs. of methamphetamine in the parcel, and he paid for it with BitCoin. Manley further estimated that he had ordered and received approximately 50 parcels containing narcotics from suppliers on the dark web.

5. Inside Manley's bedroom, inspectors seized defendants *in rem* (2) and (3) from the right nightstand, and defendant *in rem* (4) from the left nightstand inside the bedroom. Inside a safe, inspectors seized the defendant *in rem* (1) \$8,332.75, a portion of \$54,483.00 from a black vault box in a safe, \$647.93 from a large plastic jug labeled "criminal cash," and \$27.16 in loose bills and coins; the defendants *in rem* (7) through (19) collectible currency in plastic sleeves; approximately 10 grams lab-tested methamphetamine; an unloaded Smith & Wesson 9-mm handgun; a loaded magazine for the handgun; a ledger containing money amounts; and small plastic baggies consistent with drug packaging. Inspectors seized \$1,209 from Manley's wallet, along with a fake identification card.





6. From the living room, Inspectors seized: a silver vial of 2.631 grams of lab-tested methamphetamine from inside a purse with Barton's identification; various drug paraphernalia such as pipes, vials, two small scales, and brass knuckles; numerous laptops, hard drives and thumb drives; a coin counter; a cash counter, and defendants *in rem* (5) and (6) from a television cart.



7. Manley is currently being prosecuted by the United States Attorney's Office on felony controlled-drug charges. Barton has two active NH warrants and is currently living in Florida. Her criminal history includes a misdemeanor conviction of controlling premises where drugs are kept in 2016, and a 2017 felony charge for sale of fentanyl for which she did not appear in court and is wanted by the Boscawen Sheriff's office.

CLAIM FOR FORFEITURE
21 U.S.C. § 881(a)(6)

8. The allegations contained in paragraphs 1-7 of this Verified Complaint for Forfeiture *in Rem* are incorporated by reference.

9. Title 21, U.S.C. § 881(a)(6) subjects to forfeiture “all moneys ... or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or ... all proceeds traceable to such an exchange and all moneys ... used or intended to be used to facilitate any violation of” the Controlled Substances Act.

10. The defendants *in rem* were furnished or intended to be furnished in exchange for a controlled substance, in violation of the Controlled Substances Act, 21 U.S.C. § 801, et seq., or represents proceeds traceable to such exchanges, or money used or intended to be used to facilitate violations of the Act. As a result, the defendants *in rem* are liable for condemnation and forfeiture to the United States for its use in accordance with 21 U.S.C. § 881(a)(6).

PRAYERS FOR RELIEF

Therefore, the United States requests that:

(a) the Clerk of Court issue a Warrant of Arrest *in Rem*, in the form submitted with this Verified Complaint, to the United States Marshals Service, commanding them to arrest the defendants *in rem*;

(b) this matter be scheduled for a jury trial;

(c) judgment be entered against the defendants *in rem*;

(d) the defendants *in rem* be disposed of according to law; and

(e) this Court grant the United States its costs and whatever other relief to which it may be entitled.

Respectfully submitted,

SCOTT W. MURRAY
United States Attorney

Dated: January 7, 2021

By: /s/ Robert J. Rabuck
Robert J. Rabuck
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VERIFICATION

I, Bruce Sweet, being duly sworn, depose and say that I am a Postal Inspector assigned to the United States Postal Inspection Service, and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *in rem* and know the contents therein, and that the same is true to the best of my knowledge, information and belief.

The sources of my information and the grounds of my belief are official records and files of the United States and the State of New Hampshire, and information obtained by me and other law enforcement officers during an investigation of alleged violations of the controlled substances laws of the State of New Hampshire and of the United States.

/s/ Bruce A. Sweet
Bruce A. Sweet

STATE OF NEW HAMPSHIRE
COUNTY OF MERRIMACK

Subscribed and sworn to before me this 7th day of January 2021.

/s/ Joan E. Hederman
Notary Public

My commission expires on April 8, 2025.